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in regard to the citizenship of District of Columbia corporations, it would obviously not prevent the removal of a cause on the broader ground of a federal question being involved. That this would be a proper ground for removal in cases turning on a proper interpretation of the act of Congress creating the corporation is evident. But it is hard to understand how all suits to which the corporation is a party can be said to arise under laws of the United States. What federal question is involved, for example, in an ordinary tort action brought against the corporation in a state court? Nevertheless the writer's conclusion in its broad form seems to be established by the authorities. *Pacific R. R. Removal Cases*, 115 U. S. 2; *Butler v. National Home*, 144 U. S. 64, 66. National banks present only an apparent exception, as the right of removal has there been expressly limited by act of Congress. *Ex parte Jones*, 164 U. S. 691.

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LOCUS OF SALES C. O. D. — In the case of a shipment of goods through a carrier C. O. D., the question arises as to where the sale takes place. One group of decisions holds, according to the Pennsylvania rule, that title passes to the vendee at the point of shipment, possession alone being retained, under a vendor's lien. Another group, following the Vermont rule, holds that in such cases the sale takes place and title is transferred only at the place of ultimate destination, on payment of the price and delivery of the goods. There are several instances in which this question is of vital importance, as in determining which jurisdiction may take cognizance of the validity of the sale; in deciding the criminality of the vendor in case of sales prohibited in one place but allowed in the other; in ascertaining the place of prosecution when such sales are criminal under the laws of both jurisdictions; and in determining the person upon whom the loss shall fall in case of injury or destruction of the goods in transit. The subject is interestingly presented in a recent article in the Columbia Law Review. *The Locus of Sales C. O. D.*, by Charles Noble Gregory, 4 Columbia L. Rev. 541 (Dec. 1904). The writer makes a lengthy and careful review of the decisions in point, showing that the decided weight of authority supports the rule that title passes upon delivery to the carrier. This is not only more in harmony with the general law of sales, but it completely carries out the intention of the parties by giving the vendor security, and still passing title and, along with it, the risk, to the vendee. The Vermont rule, on the other hand, is objectionable in that it subjects consignors to criminal prosecution under a strained presumption as to their knowledge of laws in force at remote points. It tends to hamper many large and useful branches of trade, for it makes dealers hesitate to ship any commodity C. O. D. the sale of which has ever been placed under restriction, without first carefully informing themselves as to the statutes and even the local ordinances in force at the point of destination. It bears more heavily upon the small dealers without established credit, to whom shipments are most frequently made C. O. D., than upon large dealers whose credit is established. And finally the Vermont rule is based upon the erroneous supposition that the carrier in this class of cases is exclusively the agent of the consignor. The writer concludes by suggesting a clause embodying the substance of the Pennsylvania rule for incorporation in the proposed "Draft of an Act Relating to the Sale of Goods."

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NECESSITY FOR TRANSFER OF STOCK ON BOOKS OF COMPANY. — In view of the rapidly increasing wealth, magnitude, and number of corporations, and the prevalent business practice of using the stock as collateral security on which to obtain credit, the question as to the respective rights and duties of the various parties interested in its transfer is one of constantly growing importance. The Central Law Journal presents a carefully prepared article in point. *What Constitutes a Complete Transfer of Stock as against Third Parties*, by Romney L. Willson, 59 Cent. L. J. 448 (Dec. 2, 1904). The author calls atten-